# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 7

UNIQUE FABRICATING, INC., et al., 1

Case No. 23-11824 (KBO)

Debtors.

(Jointly Administered)

## CERTIFICATION OF COUNSEL REGARDING STIPULATED ORDER REGARDING THE PROOFS OF CLAIM OF SENIOR LENDERS

The undersigned counsel for secured creditor Citizens Bank, N.A. ("Senior Agent") hereby certifies as follows:

- 1. The Senior Agent and counsel for the Chapter 7 Trustee ("Trustee") engaged in discussions regarding the procedure for the Senior Agent to file proofs of claim on behalf of the "Senior Lenders" (collectively, Citizens Bank, National Association, Comerica Bank, Flagstar Bank, FSB, and KeyBank National Association).
- 2. On March 15, 2024 the Senior Agent and counsel for the Trustee agreed to the Stipulated Order Regarding the Proofs of Claim of Senior Lenders (the Stipulated Order"), which is attached hereto as **Exhibit A**.
- 3. Accordingly, the Trustee and the Senior Agent request that the Court sign the Stipulated order and direct that it be docketed.

#### [REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

The debtors in these cases, along with the last four digits of the federal tax identification number for each of the debtors, where applicable are: Unique Fabricating, Inc. (6791); Unique Fabricating NA, Inc. (8349); Unique Fabricating South, Inc. (9868); Unique-Prescotech, Inc. (9729); Unique-Chardan, Inc. (8350); Unique Molded Foam Technologies, Inc. (3749); Unique-Intasco USA, Inc. (8572); and Unique Fabricating Realty, LLC (N/A).

Dated: March 17, 2024 MORRIS, NICHOLS, ARSHT & TUNNELL LLP

#### /s/ Derek C. Abbott

Derek C. Abbott (No. 3376) 1201 N. Market Street, 16th Floor P.O. Box 1347 Wilmington, DE 19899-1347

Wilmington, DE 19899-1347 Telephone: (302) 658-9200

Email: dabbott@morrisnichols.com

BARRIS, SOTT, DENN & DRIKER, P.L.L.C.

### /s/ C. David Bargamian

C. David Bargamian (admitted Pro Hac Vice) 333 West Fort Street, Suite 1200 Detroit, MI 48226

Telephone: (313) 965-9275 Email: <u>dbargamian@bsdd.com</u>

Counsel for the Agent and Senior Lenders